

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

N.R., a disabled minor by and through the)	
Guardian of her Estate, FIRST MIDWEST)	
BANK, and ASHANTE WILLIS,)	
Individually, and JAMES RICE,)	
Individually,)	Civil No. 3:21-cv-342-MAB
)	
Plaintiffs,)	
)	
vs.)	
)	
UNITED STATES OF AMERICA and)	
ALTON MEMORIAL HOSPITAL,)	
)	
Defendants.)	

**DEFENDANT UNITED STATES OF AMERICA'S RESPONSES TO PLAINTIFF'S FIRST
REQUEST FOR ADMISSIONS TO DEFENDANT UNITED STATES OF AMERICA**

Defendant United States of America, by and through its attorneys, Steven D. Weinhoeft, United States Attorney for the Southern District of Illinois, and Assistant United States Attorney Ray M. Syrcle, for its Responses and Objections to Plaintiff's First Request for Admissions to Defendant USA, states as follows:

REQUESTS FOR ADMISSION

REQUEST NO. 1: Please admit that you were properly served Plaintiffs' Complaint.

RESPONSE:

Admit.

REQUEST NO. 2: Please admit that the following individuals were agents and/or employees of Defendant USA in August of 2018:

1. Baker, Rachel R.N.
2. Bradshaw, Holly R.N.
3. Hauch, Amy NP
4. Hazelwood, Dana R.N.
5. Hill, Laura Pulaski
6. Kolade, Olamide M.D.
7. Lahey, Diane Marie R.N.
8. Ledbetter, Hilda R.N.

9. McCullough, Timothy M.D.
10. Saboff, Sheryl Ann R.N.
11. Schmidt, Richard Urban Jr.
12. Short, Amy Katheryn R.N.

RESPONSE:

Defendant admits that in August 2018 Southern Illinois Healthcare Foundation (SIHF) was a deemed entity of the Public Health Service and that Dr. Olamide Kolade, in his capacity as an employee of SIHF, was a deemed employee of the Public Health Service, pursuant to the Federally Support Health Centers Assistance Act of 1992 (“FSHCAA”), 42 U.S.C. § 233. Defendant denies the remainder.

Respectfully submitted,

STEVEN D. WEINHOFET
United States Attorney

s/ *Ray M. Syrcle*
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 23, 2021, he served a copy of the attached

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by electronically providing a copy to the persons hereinafter named, pursuant to the parties' agreement that service of this document via email and by filing with the Court via CM-ECF.

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/s Ray M. Syrcle

Ray M. Syrcle